

TONY WEST
Assistant Attorney General
Civil Division
KATHERINE E.M. GOETTEL (Iowa #23821)
Trial Attorney
Office of Immigration Litigation
Civil Division, Justice Department
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044
Tel: (202) 532-4115
Fax: (202) 305-7000
E-mail: kate.goettel@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK ANTHONY DUNNE; AUDREY)	Case No. 3:10-cv-05636-EMC
GRACE FITZSIMMONS,)	
)	STIPULATION TO EXTEND DATES
Plaintiffs,)	AND [PROPOSED] ORDER
)	
vs.)	
)	
DEPARTMENT OF HOMELAND)	
SECURITY; ATTORNEY GENERAL)	
ERIC H. HOLDER, JR.; IMMIGRATION)	
AND CUSTOMS ENFORCEMENT;)	
TIMOTHY S. AITKEN,)	
)	
Defendants.)	

Plaintiffs, by and through his attorneys of record, and Defendants, by and through their attorneys of record, stipulate to the following:

1. Plaintiffs filed a complaint in this action on December 13, 2010. Plaintiffs perfected service on January 21, 2011. Defendants' original deadline to answer or respond was March 22, 2011. This Court granted the parties' first extension until April 21, 2011.

2. The Defendants are still in the process of gathering information and documents, and determining their position on this case, and require additional time to complete these tasks before filing an answer or responsive pleadings.

3. Therefore, the parties hereby respectfully request this Court to order a twenty-one day

STIPULATION FOR EXTENSION OF TIME
Case No. C 10-5636

extension of time within which the Defendants must serve their response in the above-entitled action. Defendants will file their response on or before May 12, 2011.

Respectfully submitted,

Dated: April 15, 2011

s/ Katherine E.M. Goettel

KATHERINE E.M. GOETTEL
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
(202) 532-4115
(202) 305-7000 (fax)
E-mail: kate.goettel@usdoj.gov

Dated: April 15, 2011

s/ James M. Byrne
JAMES M. BYRNE

Law Offices of James M. Byrne
1374 Pacific Avenue
San Francisco, CA 94109
415 777-4444
Fax: 415 777-0282
Email: jbyrne@byrne-law.net

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 18, 2011



STIPULATION FOR EXTENSION OF TIME
Case No. C 10-5636

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify this document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

Dated: April 15, 2011

/s/ Katherine E.M. Goettel
KATHERINE E.M. GOETTEL